



# Lamb Communication Services

Filed Electronically Via ECFS February 6, 2006  
EB DOCKET NO. 06-36

February 6, 2006

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Reference: EB-06-TC-060, Certification of CPNI Filing of OneEighty Communications, Inc.**

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate of OneEighty Communications, Inc. ("OneEighty") (499 Filer ID 821850) in response to the Public Notice issued by the Federal Communication Commission's Enforcement Bureau on January 30, 2006. The Enforcement Bureau has requested the compliance certificate as required by section 64.2009(e) of the Commission's rules.

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan Lamb".

Susan Lamb  
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OneEighty Communications, Inc.  
CPNI Certification and Statement

Before the  
Federal Communications Commission  
Washington, D.C. 20554

CPNI Compliance Certification	)	<b>EB-06-TC-060, EB Docket No. 06-36</b>
As Required by FCC Enforcement	)	OneEighty Communications, Inc.
Bureau, DA 06-223	)	499 Filer ID 821850

**ONEEIGHTY COMMUNICATIONS, INC.**  
**CERTIFICATION OF CPNI FILING (February 6, 2006)**

1. OneEighty Communications, Inc. ("OneEighty") (499 Filer ID 821850) is submitting this compliance certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223), pursuant to section 64.2009(e) of the Federal Communication Commission's rules.
2. I am the President and Chief Executive Officer, for OneEighty. I make this certification from my personal knowledge of the CPNI procedures and policies of OneEighty.
3. OneEighty does not use CPNI for general marketing purposes at this time. In those few situations where we do a specific marketing campaign which includes testimonials from customers, each customer is contacted and permission is received for that specific marketing promotion. In the event that we decide to use CPNI for general marketing purposes, we will notify our customers under the "opt-out" provisions of the rules. When OneEighty decides to use CPNI for general marketing purposes it will be done in strict compliance with the principles and requirements outlined in 47 CFR §64 Subpart U of the Commission's rules.
4. On behalf of OneEighty, I certify that, pursuant to the Commission's rules, OneEighty has established procedures that are adequate to ensure compliance with CPNI rules currently in effect and the statements contained in this filing are correct.



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Chris Dimock  
President and Chief Executive Officer

Before the  
Federal Communications Commission  
Washington, D.C. 20554

CPNI Compliance Certification	)	<b>EB-06-TC-060, EB Docket No. 06-36</b>
As Required by FCC Enforcement	)	OneEighty Communications, Inc.
Bureau, DA 06-223	)	499 Filer ID 821850

**ONEEIGHTY COMMUNICATIONS, INC.  
CERTIFICATION OF CPNI FILING (February 6, 2006)**

**OPERATING PROCEDURES STATEMENT**

1. It is OneEighty's policy and practice that all customer CPNI information is private and protected unless the authorized customer contact of record specifically requests to "opt-in" to CPNI usage and allow it to be made available to specific vendors or parties in writing and provides a Letter of Authorization ("LOA") to confirm their request. OneEighty considers that all of the customer's have "opted-out" of CPNI usage unless the customer specifically requests to "opt-in" and allow CPNI usage.

2. Customer accounts are prominently noted with the authorized customer contact details and LOA on file indication so that OneEighty Sales and Customer Care Representatives can readily identify customers opting to not restrict use of their CPNI. When calls are received by OneEighty Sales and Customer Care from customers with this preferred treatment they verify that they are speaking with the authorized customer party. If they receive a call from a vendor on the customer's behalf they immediately determine the vendors name and number and review the account for a LOA. In the event there is any discrepancy between the vendor's information and the LOA the authorized customer contact is called and a return call is made to the vendor.

3. Customers are informed at install that their personal information is safeguarded and will not be used by OneEighty or given out to anyone other than the authorized party unless the customer's authorized party of record informs OneEighty they wish to "opt-in" to CPNI usage at which time OneEighty would request a LOA from the customer. Additionally, customers may "opt-in" or "opt-out" at any time.

4. Notice regarding customer CPNI rights and OneEighty's duty to protect CPNI is provided to all customers in the form of a notice printed every year on the customer's billing statement.

5. OneEighty employees are trained on the proper use and/or disclosure of CPNI a minimum of once/year.

6. Access to CPNI data is limited to employees with a need to know in order to do their jobs and/or entities with proper authorization as allowed under Commission rules. All employees and/or entities with such access operate under policies and/or contract requiring nondisclosure of confidential information.

7. OneEighty management reviews all marketing campaigns and materials and are key to contacting targeted customers for their permission to be included in a specific marketing campaign. These campaigns generally take the form of testimonials. As of this time OneEighty has not used CPNI data in any general marketing campaigns or materials but the proper safeguards are in place should customer CPNI be used for this purpose.

8. An employees improper use or disclosure of CPNI is subject OneEighty's disciplinary policies and is reviewed a minimum of once per year.